



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

**CERTIFIED MAIL -**  
**RETURN RECEIPT REQUESTED**

April 21, 2008

Charles J. Cappannari, Manager, Environmental Services  
Cytec Industries Inc.  
P.O. Box 425  
South Cherry Street  
Wallingford, CT 06492

Re: Reporting Requirement under the Clean Air Act  
EPA Docket No. AAA-08-0024

Dear Mr. Cappannari:

The United States Environmental Protection Agency ("EPA") is evaluating whether Cytec Industries Inc. ("Cytec"), in Wallingford, Connecticut, is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. The regulations include, but are not limited to, the National Emission Standards for Hazardous Air Pollutant Emissions - Manufacture of Amino/Phenolic Resins found at 40 CFR Part 63, Subpart OOO; and the Standards of Performance of Volatile Organic Liquid Storage Vessels found at 40 CFR Part 60, Subpart Kb.

As you know, on November 29, 2007, EPA issued an Administrative Order and Reporting Requirement (EPA Docket No. AAA-08-0008) to Cytec regarding its facility located at South Cherry Street in Wallingford, Connecticut. Cytec responded to EPA's Reporting Requirement ("RR") on February 15, 2008. EPA has a number of follow-up questions about Cytec's response. As a result, EPA is issuing a second RR to Cytec. EPA issues this RR under the authority of Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1).

Section 114(a)(1) of the Act, 42 U.S.C. 7414(a)(1), authorizes EPA to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine compliance with the Act or any state implementation plan. Therefore, within 14 days of receipt of this letter, Cytec is required to submit the following information to EPA:

1. In Attachment #3 of Cytec's response to EPA's November 2007 RR, Cytec provided data about emission units EU-R14-3 (Kettle 63) and EU-R14-4 (Kettle 64). Provide the following additional information about this data:
  - a. There are numerous dates when "No Data" was reported for the condenser temperature as well as the kettle temperature.
    - i. Explain what the term "No Data" means and when and why it is used.
    - ii. If products were made on a date when "No Data" was recorded for the condenser and kettle temperatures, explain how Cytec demonstrated compliance with Section III.I.2 of the Operating Permit (Permit no. 189-0136-TV).
  - b. Some entries in the *Product Made* column have the word "none," while other entries are simply blank.
    - i. Explain how, when, and why the notation "none" is used.
    - ii. Explain how, when, and why a column is left blank.
    - iii. Explain the difference between a "none" entry and a blank entry.
    - iv. Explain why on certain dates the temperature of the condenser is higher than the temperature of the kettle.
    - v. If a product was made on a day when the *Product Made* column was left blank, identify and describe the product.
  - c. Describe where the temperature readings of condenser exit temperatures are recorded. Include the location of the thermocouple in the response.
2. In Attachment #5 and Attachment #7 of Cytec's response to EPA's November 2007 RR, Cytec provided data about organic liquid storage tanks. Provide the following additional information about this data:
  - a. In Attachment #7, Cytec identified tanks # 950, 951 and 952.
    - i. Explain why these tanks were not listed on the storage tank list in Attachment #5.
    - ii. Explain whether or not tanks # 950, 951 and 952 are still in operation, and if so, describe the control system and associated monitoring used.
    - iii. If tanks # 950, 951 and 952 are not currently in operation, indicate whether or not they have operated at any time during the past five years (i.e., since April 2003), provide the duration of operation, and describe the control system and associated monitoring used. In addition, provide all records that relate to compliance with 40 CFR 60, Subpart Kb and Section III.A of the Operating Permit.

- b. In Attachment #5 of Cytec's response to EPA's November 2007 RR, Cytec indicates that tanks 511, 512, 551 and 561 use closed vent systems that are routed to scrubbers with removal efficiencies of 95%.
    - i. Indicate how the efficiency of each system/scrubber was determined.
    - ii. Provide documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions as required by 40 CFR § 60.113b(c)(1)(i) and Section III.A.1.a.iii of the Operating Permit.
    - iii. Provide a description of the parameters that Cytec monitors to ensure the control device is operated in conformance with its design as well as an explanation of the criteria Cytec used to select those parameters as required by 40 CFR § 60.113b(c)(1)(ii) and Section III.A.1.a.iii of the Operating Permit.
    - iv. Provide records of the measured values of the parameters monitored for the past five years (i.e., since April 2003) as required by 40 CFR § 60.115b(c)(2) and Section III.A.1.b.ii of the Operating Permit. Include documentation demonstrating the correlation between the selected parameters and the efficiency of the device.
    - v. Provide any other records for the past five years that relate to compliance with 40 CFR 60, Subpart Kb and Section III.A of the Operating Permit that are not listed above.
    - vi. Describe the operating status of tanks 511, 512, 551 and 561. Explain why these tanks are marked as "revoked" in Section II.A (Table II.A.1) of the Operating Permit.
  - c. For emission units EU-R14-1 through R14-10, provide records of Cytec's leak detection and repair activities for the past five years as required by Section III.I.3 of the Operating Permit.
3. Cytec's February 15, 2008 response to Question 38.n states that Kettles 63 and 64 have been permanently shut down. Provide the following additional information.
- a. Indicate whether or not it is Cytec's intent to place Kettles 63 and 64 permanently out of production.
  - b. Provide further details regarding how and when Kettles 63 and 64 were placed out of production. Provide details regarding any removal or demolition of the Kettles and/or any related equipment.
  - c. Provide the last date of production for Kettles 63 and 64.
  - d. Provide any documents to substantiate Cytec's statement that Kettles 63 and 64 have been permanently shut down.

Be aware that if Cytec does not provide the requested information, EPA may order Cytec to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Cytec may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Cytec. Please be aware that the State of Connecticut may have different rules and regulations governing the protection and release of confidential business information.

Submit the above-required information to:

Susan Studlien, Director  
Office of Environmental Stewardship (Mail Code SAA)  
U.S. Environmental Protection Agency, Region I  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023  
Attn: Abdi Mohamoud, Air Technical Unit

If you have any questions regarding this reporting requirement, please contact Abdi T. Mohamoud (617) 918-1858 or have your attorney call John Kilborn, Senior Enforcement Counsel at (617) 918-1893.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship  
U.S. EPA Region 1

cc: Robert Tyler, Cytec (via email)  
Tom Mesevage, Esq. Cytec (via email)  
Robert Girard, CT DEP